

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO: 0410080GAO

RALPH J. VOLLMANN, *
Plaintiff *
*
VS. *
*
ROGER LYNN GRUBB and *
ALLIED SYSTEMS LTD., *
Defendants *

PLAINTIFF'S MOTION TO COMPEL DISCLOSURE OF INSURANCE INFORMATION

Now comes the plaintiff, Ralph Vollman, in the above entitled mater and requests this Honorable Court compel Defendants to provide accurate and current insurance information as previously requested by Plaintiff and as required pursuant to Fed. R. Civ. P. Rule 26(a)(1)(D).

I. BRIEF BACKGROUND

Plaintiff suffered traumatic injuries including multiple fractures of ankle and ribs, as well as an infection resulting in Toxic Epidural Necrosis Syndrome/Stevens Johnson Syndrome, in an automobile accident with defendant driver, Roger Lynn Grubb, on 4/3/03. Medical billing to date totals \$793,099.36. Roger Lynn Grubb was employed by defendant, Allied Systems, Ltd.

II. INSURANCE DISCLOSURE

Specifically, Plaintiff requests information regarding the following:

1. Irrevocable Letters of Credit applicable to the instant claim.
2. Captive Insurance policies or companies applicable to the instant claim.

3. Policies registered with the Department of Transportation listed as insuring defendant, Allied Holdings, without deductible. (See Exhibit A)
4. The applicability of the "drop down" clause in the ACE insurance policy to the present bankruptcy situation. (See Exhibit B)

Wherefore, the plaintiff prays for an Order compelling Defendants to produce the requested information listed above.

By Plaintiff's Attorney,

Dated: 8/4/06

/s/ Paul Nathan.
Paul Nathan, Esquire
B.B.O. # 367420
NATHAN & KREVAT
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I hereby certify that a true original of the above document was served upon the attorney of record for each party via first-class mail on 8/4/06
Paul Nathan